the requirements of the Act.
Provision of Number Portability

Consistent with our discussion in Section VI.K. of this Order, we find that this portion of BellSouth's SGAT satisfies the requirements of the Act.

Dialing Parity

Consistent with our discussion in Section VI.L. of this Order, we find that this portion of BellSouth's SGAT satisfies the requirements of the Act.

Reciprocal Compensation

Consistent with our discussion in Section VI.M. of this Order, we find that this portion of BellSouth's SGAT satisfies the requirements of the Act.

BellSouth Retail Services Available for Resale

The resale portion of the SGAT does not comply with the requirements of \$251(c)(4) and 252(d)(3) as discussed more fully in Section VI.N. of this Order. Following is a summary of the problems we have identified.

BellSouth states that retail services must be resold in compliance with the applicable terms and conditions in BellSouth's existing retail tariffs. This restriction is in violation of FCC 96-325, ¶939, and Order No. PSC-96-1579-FOF-TP.

The FCC's Order states, and we agree, that restrictions on resale, including those in the LECs' tariffs, are presumptively unreasonable and therefore in violation of Section 251(c)(4).

BellSouth also states that it reserves the right to periodically audit the services purchased by an ALEC to make sure that such services are being used in conformity with the SGAT and BellSouth's tariffs. We believe this requirement violates Section 251(c)(4).

BellSouth cannot render accurate bills for resold services. Also as stated in the UNE summary, we find that the interfaces and processes offered by BellSouth do not permit an ALEC to

perform an OSS function in substantially the same time and manner as BellSouth performs the functions for itself.

Performance Measures

As discussed more fully in Part VII. of this Order, we find that BellSouth's performance standards and measurements are not adequate to demonstrate nondiscrimination. BellSouth should provide performance measures that are clearly defined, permit comparison with BellSouth retail operations, and are sufficiently disaggregated to permit meaningful comparison.

We find that BellSouth's SGAT does not comply with Section 252(f)(2) of the Act at this time. Section 252(f)(2) of the Act requires that the SGAT comply with Section 252(d), which requires nondiscriminatory cost based prices. As discussed above, some of the rates specified in the SGAT do not meet the requirements of the Act. Section 252(f)(2) of the Act also requires that the SGAT comply with Section 251, which defines the duties of interconnection, unbundled access, and resale. As discussed above, we find that BellSouth's SGAT is not fully compliant with Section 251 of the Act. Accordingly, we deny BellSouth's request for approval of its SGAT pursuant to Section 252(f) of the Act.

X. CONCLUSION

This concludes our review of BellSouth's Petition filed Section 271(c) and its Statement of available Terms and Conditions. We believe that our decision on BellSouth's Petition is consistent with the terms of Section 271(c) of the Act, the provisions of the FCC's implementing rules that have not been vacated, and the applicable provisions of our arbitration orders. In addition, we have conducted our review of Statement of Generally Available Terms and Conditions pursuant to Section 252(f) of the Act.

We note that although we are unable to approve BellSouth's Petition for InterLATA authority or its SGAT, we believe BellSouth has made significant progress in meeting the requirements of the Act at this time. We believe that by our decision today, we are narrowing the issues that need to be addressed before BellSouth may enter the interLATA market.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission that each and all of the specific findings herein are approved in every respect. It is further

ORDERED that Part IX of this Order, issued as proposed agency action, shall become final and effective unless an appropriate petition, in the form provided by Rule 25-22.036, Florida Administrative Code, is received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings or Judicial Review" attached hereto. It is further

ORDERED that BellSouth has not met the requirements of Section 271(c)(1)(A), of the Telecommunications Act of 1996, as discussed in Part III of this Order. It is further

ORDERED that BellSouth has not met the requirements of Section 271(c)(1)(B), of the Telecommunications Act of 1996, as discussed in Part IV of this Order. It is further

ORDERED that BellSouth cannot meet the requirements of Section 271(c)(1), of the Telecommunications Act through a combination of Section 271(c)(1)(A) and Section 271(c)(1)(B), as discussed in Part V of this Order. It is further

ORDERED that BellSouth has not provided interconnection in accordance with the requirements of the Sections 252(c)(2) and 252(d)(1), pursuant to Section 271(c)(2)(B)(i) of the Telecommunications Act of 1996, as discussed in Section VI. A. of this Order. It is further

ORDERED that BellSouth has not provided nondiscriminatory access to network elements in accordance with the requirements of Sections 251(c)(3) and 252(d)(1), pursuant to Section 271(c)(2)(B)(ii) of the Telecommunications Act of 1996, as discussed in Section VI.B. of this Order. It is further

ORDERED that BellSouth is providing nondiscriminatory access to poles, ducts, conduits and rights-of-way, as required by Section 271(c)(2)(B)(iii), of the Telecommunications Act of 1996, as discussed in Section VI.C. of this Order. It is further

ORDERED that BellSouth has unbundled the local loop transmission between the central office and the customers' premises as required by Section 271(c)(2)(B)(iv), of the Telecommunications Act of 1996, as discussed in Section VI.D. of this Order. It is further

ORDERED that BellSouth has not unbundled local transport as required by Section 271(c)(2)(B)(v), of the Telecommunications Act of 1996, as discussed in Section VI.E. of this Order. It is further

ORDERED that BellSouth has not unbundled local switching as required by Section 271(c)(2)(B)(vi), of the Telecommunications Act of 1996, as discussed in Section VI.F. of this Order. It is further

ORDERED that BellSouth is providing 911 and E911 services, and operator completion services in accordance with Section 271(c)(2)(B)(vii) of the Telecommunications Act, as discussed in Section VI.G. of this Order. It is further

ORDERED that BellSouth is providing white page directory listings in accordance with Section 271(c)(2)(B)(viii), of the Telecommunications Act of 1996, as discussed in Section VI.H. of this Order. It is further

ORDERED that BellSouth is providing nondiscriminatory access to telephone numbers in accordance with Section 271(c)(2)(B)(ix), of the Telecommunications Act of 1996, as discussed in Section VI.I. of this Order. It is further

ORDERED that BellSouth is providing nondiscriminatory access to databases and associated signaling necessary for call routing and completion in accordance with Section 271(c)(2)(B)(x), of the Telecommunications Act of 1996, as discussed in Section VI.J. of this Order. It is further

ORDERED that BellSouth is providing number portability in accordance with Section 271(c)(2)(B)(xi) of the Telecommunications Act of 1996, as discussed in Section VI.K. of this Order. It is further

ORDERED that BellSouth is providing local dialing parity in accordance with Section 251(b)(3), pursuant to Section 271(c)(2)(B)(xii) of the Telecommunications Act of 1996, as discussed in Section VI.L. of this Order. It is further

ORDERED that BellSouth is providing reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2), pursuant to Section 271(c)(2)(B)(xiii) of the Act, as discussed in Section VI.M. of this Order. It is further

ORDERED that BellSouth has not provided telecommunications services available for resale in accordance with the requirements of Sections 251(c)(4) and 252(d)(3), pursuant to Section 271(c)(2)(B)(xiv), of the Telecommunications Act of 1996, as discussed in Section VI.N. of this Order. It is further

ORDERED that BellSouth has not developed adequate performance standards for unbundled network elements and for services offered for resale as discussed in Part VII of this Order. It is further

ORDERED that BellSouth has met the dialing parity requirements of Section 271(e)(2)(A) of the Telecommunications Act of 1996, as discussed in Part VIII of this Order. It is further

ORDERED that we do not approve BellSouth's Statement of Generally Available Terms and Conditions at this time as discussed in Part IX of this Order. It is further

ORDERED that this docket shall remain open.

By ORDER of the Florida Public Service Commission this 19th day of November, 1997.

/s/ Blanca S. Bayó
BLANCA S. BAYÓ, Director
Division of Records and Reporting

This is a facsimile copy. A signed copy of the order may be obtained by calling 1-850-413-6770.

(SEAL)

MMB/BC

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

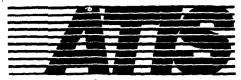
The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

As identified in the body of this order, our action in Part IX is preliminary in nature and will not become effective or final, except as provided by Rule 25-22.029, Florida Administrative Code. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, as provided by Rule 25-22.029(4), Florida Administrative Code, in the form provided by Rule 25-22.036(7)(a) and (f), Florida Administrative Code. This petition must be received by the Director, Division of Records and Reporting, at 2540 Shumard Oak Boulevard, Tallahassee, Florida

32399-0850, by the close of business on <u>December 10, 1997</u>. If such a petition is filed, mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing. In the absence of such a petition, this order shall become effective on the date subsequent to the above date as provided by Rule 25-22.029(6), Florida Administrative Code.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

Any party adversely affected by the Commission's final action in this matter may request reconsideration of the decision by filing a motion for reconsideration with the Director, Division of Records and Reporting within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code.



Alliance for Telecommunications **Industry Solutions**

October 31, 1997

Sponsor of the

To: Mr. Glen Sirles, OBF Moderator

Subject: Reply to OBF Liaison dated August 27, 1997

Dear Glen:

TOIC Bectronic Communications

Implementation Committee

In accordance with the liaison agreement established between OBF and TCIF, ECIC has completed its initial work regarding OBF Issue #1278/O&P, Pre-Service Requirements.

A committee of the Telecommunications Industry Forum (TCIF)

> 1200 G Street NW Suite 500 Washington DC 20005

> > 202-434-8836 Fax: 202-393-5453

As noted in the ECIC liaison letter dated September 16, 1997, the ECIC Steering Committee formed and charged the Pre-Ordering Technology Task Group (POTTG) with analyzing and recommending an appropriate data model(s) and transport technology(s) to support the business requirement for the OBF local pre-order process.

Jerome Melson ECIC Chair

Bill Arkwright **ECIC Vice Chair**

The POTTG analyzed three different technologies (CMIP, EDI/SSL3, and CORBA), and reported its findings to the Steering Committee. Detailed POTTG meeting records are available at the ATIS/TCIF/ECIC home page.

Susan Miller Vice President & General Counsel **ATIS**

While it was the goal of ECIC to have a single technology recommendation, the group decided that two technologies best suit the business needs of the industry at present.

Christine Golombos ECIC Administrator 732-699-8428 FAX: 732-336-2304

ECIC suggests that OBF support the concurrent development of data modeling and implementation guidelines of CORBA and EDI/SSL3 technologies to satisfy the requirement. ECIC anticipates, however, that CORBA may emerge as the preferred long term solution.

In keeping with the liaison agreement, ECIC will be happy to partner with OBF in communicating the necessary liaisons to the EDI and T1M1 Committees.

Please contact me on (513) 856-7041 if you have any further questions.

Sincerely,

Jerome Melson **ECIC Chair**

cc: Dianne Moore, OBF Assistant Moderator John McDonough, T1M1 Chair Elizabeth Frohse, EDI Chair Tom Smith, OBF O&P Committee Co-Leader Marybeth Degeorgis, OBF O&P Committee Co-Leader

@ BELLSOUTH

BallSouth interconnection Services

770 492-7950 Fax 770 492-9412 AT&T Regional Account Team

Suite 200 1960 West Exchange Place Tucker, Georgia 30084

November 4, 1997

Cindy Clark
AT&T
Promenade II, FLOC 12W45
1200 Peachtree Street, NE
Atlanta, QA 30309

Ms. Clark:

As of November 1, 1997, LENS has been updated to Release 1.1, and several changes have been made that may affect AT&T pre-ordering capabilities. The changes and enhancements are as follows:

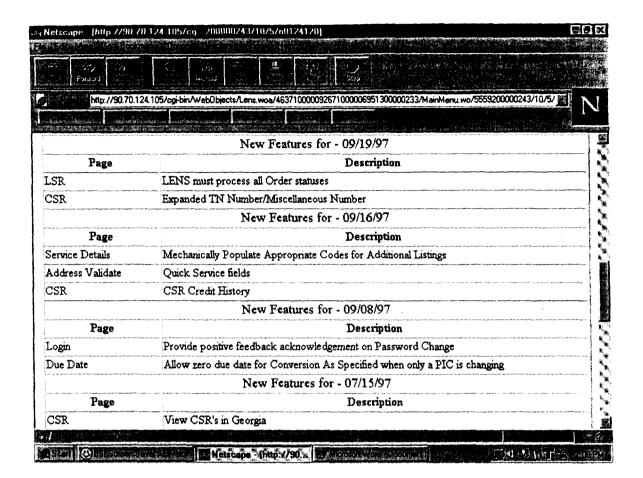
- Disable viewing of credit history in the state of Alabama. Based on a legal review of the PSC order, it was determined that credit history was not part of the customer record in Alabama. Therefore, it will be removed with Release 1.1.
- Enable viewing of credit history on customer records in Florida (North, South, and Southeast).
- Screen will be modified to allow CLECS to view switch specific features and services. This was
 redesigned to speed up response time and allow selection of multiple services (via click and drag).
 A single button has been added to allow a LENS user to view the 5 most commonly ordered resale
 services.
 - A. The LENS users have been provided the capability of selecting multiple features by clicking the applicable features. The maximum number of features remains 20. LENS continues to provide a summary of all features selected, and the response time is significantly improved.
- 4. The due date algorithm used for calculating due dates of suspend / restore and deny / restore requests has been modified to provide same day if before 3 PM EST and next day if after 3 PM.
- LENS will no longer generate the CLT / RLT USOC when an additional listing is requested by a CLEC. Since LESOG has this logic, there is no need for duplication in LENS.

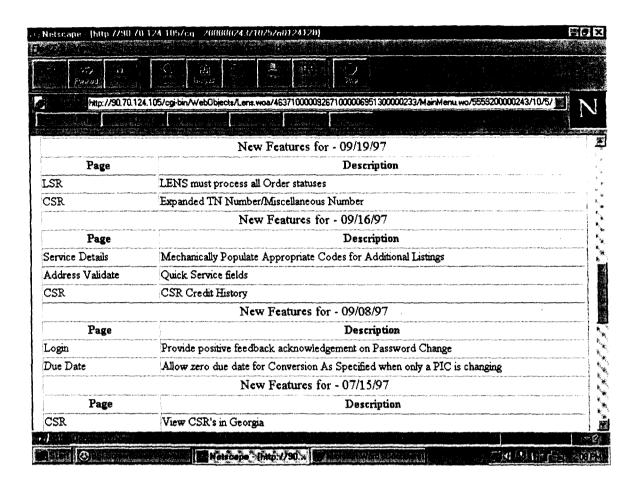
Should you have questions regarding these enhancements, please feel free to e-mail me at Gregory. Kirby 1@bridge.bellsouth.com, or call me at 770-492-7574.

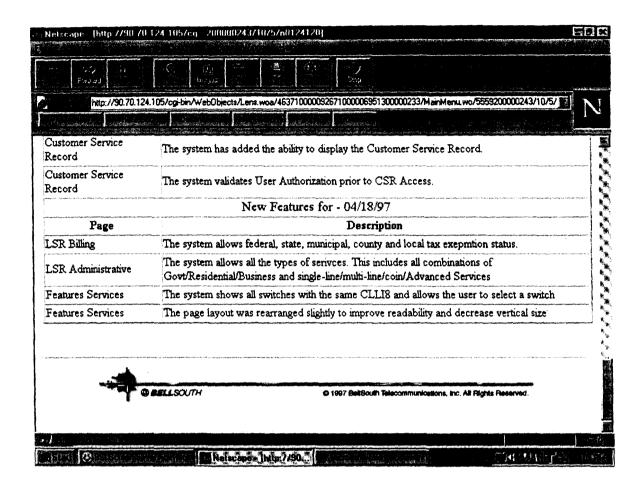
Thanks.

Greg Kirby

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Credit History	Remove Viewing of Credit History in Alabama	i
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CSR	Provide ability to view CSRs in Louisiana	
	New Features for - 09/23/97	
Page	Description	
CSR	CSR Access Using Circuit Number	
	New Features for - 09/19/97	
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* HOME * PRODUCTS * AVAILABILITY * ORDERNING * SELLSOUTH.COM *

BellSouth Interconnection Services

Recent Announcements / Customer Letters

These files are in Portable Document Format which requires Adobe Acrobat Reader. You can download Acrobat here.



Date	Title
Oct 31, 1997	LENS "Feature & Services" Screen Enhancement - November 3, 1997
Sep 22, 1997	Encore Electronic Interface Release 1
Sep 07, 1997	LENS Resale Orders

Home | Online Ordering | Availability Lookup | BellSouth.com

LENS Enhancement Announcement

"Feature & Services" Screen Enhancement

An enhancement to the features and services function in our LENS system will be in place on Monday, November 3, 1997. This announcement provides a description of this enhancement and instructions for its use.

The initial features and services screen, which displays interexchange carrier availability, now contains a button that reads "Continue to Features and Services". The site reached by clicking on this button contains an alphabetical list of services. Information about features available for a specific service may be obtained by highlighting services from this list. The representative may simultaneously highlight up to five services, click on "Show Features for Service", and the features for those services will be displayed at the bottom of the screen.

For example, to view the availability of BellSouth® TouchStar® service and Touchtone for a particular switch:

- 1. Click on "TouchStar" and drag to "Touchtone" to highlight both services.
- 2. Click on "Show Features for Service".
- 3. Scroll to the bottom of the screen to view the features for the selected services.
- 4. Use the mouse to click in the appropriate box for the desired features.
- 5. After selecting all desired features, click on the "Add Features" button at the bottom of the screen. LENS will display a complete list of the selected features at the bottom of the screen after the "Add Features" button is selected. This list may be electronically copied or printed for future reference, if desired.
- 6. Follow the on-screen instructions to delete any selected features from this display.

Another new feature is a button entitled "Touchtone, TouchStar, RingMaster®, Custom Calling, and Customized Code Restriction". When the representative clicks on this button, he or she will receive the features for all five services. These five are the most commonly ordered resale services. The features will appear at the bottom of the screen with clearly labeled titles for each service in alphabetical order.

To use this feature, the service representative would perform the following steps:

- 1. Click on "Touchtone, TouchStar, RingMaster, Custom Calling, and Customized Code Restriction" button.
- 2. There is no need to click on "Show Features" for service.
- 3. Scroll to the bottom of the screen to view the features for the selected services.
- 4. Use the mouse to click in the appropriate box for the desired features.
- 5. After selecting all desired features, click on the "Add Features" button at the bottom of the screen. LENS will display a complete list of the selected features at the bottom of the screen after the "Add Features" button is selected. This list may be electronically copied or printed for future reference, if desired.
- 6. Follow the on-screen instructions to delete any selected features from this display.

TouchStar service and RingMaster service are registered trademarks of BellSouth Corporation

Credit Histories

Credit histories are now available for the state of Florida.

If you have any questions please contact your account team representative.



BellSouth Interconnection Services Your Interconnection Advantage

Encore Electronic Interface Release 1.0

Concurrent with the implementation of Encore Electronic Interface Release 1.0 scheduled for October 8, 1997, the following capabilities will be provided:

LENS	DESCRIPTION		
	Access to Customer Credit Histories for Florida and Alabama via the Customer Service Record (CSR)		
	Eliminate the "PON not Found" situation in LENS. Provide the ability to view all order/Local Service Request (LSR) status codes in LENS		
	CLEC view of "QuickService" indicator in LENS. Provide view of "QuickService" or the "Connect-Through" indicators on the "Validate Address Screen and the Due Date Calendar." These indicators along with equipment, feature and services ordered, are used to determine if a technician needs to be dispatched.		
	Access to CSRs via miscellaneous account numbers - LENS will allow alpha characters in the first position of the NXX field in the account number field where LENS users enter desired account number for the 'View CSR' function in Inquiry and Firm Order mode.		
	Access to CSRs via circuit numbers - Allow authorized LENS users to enter circuit numbers (in addition to TN based account number) for the purpose of accessing CSRs.		
EDI			
	LOC Data for RSAG Validation - Population of LOC Data has been revised as follows: in the BLDG field enter, WNG or PIER or BLDG; in the FLR field enter, FLR; in the RM field enter RM or APT or LOT or SLIP or SUIT or UNIT.		
	In an attempt to minimize address validation errors on "switch as is" and "switch with change" (W&V) activity, the following match sequences will be instituted:		
	 a) Match on the telephone number (TN) received on the LSR to an existing TN in the RSAG database. 		
	If successful move to (b) If unsuccessful move to (c)		
	b) Match on the house number received on the LSR to the address associated with the TN matched in RSAG.		
	If successful move to (d) If unsuccessful move to (e)		
İ	c) Match on the entire address received on the LSR		
1	If successful move to (d) If unsuccessful move to (e)		
1	d) Process order using the RSAG valid address		
	e) Place LSR into clarification and return to CLEC		
	The Firm Order Confirmation (FOC) is updated to include the actual telephone number installed at customer location if different from the one indicated on the LSR.		
	Mechanically generate service orders for the following Unbundled Network Elements (UNEs) Loop, Port, INP and Loop with INP.		

Should you require additional information or have questions, you may contact your account manager.

September 2, 1997

Re: Due Dates on LENS Resale Orders

Dear CLEC Customers:

Recently you were provided a table of due date intervals for use in determining due dates for resale orders. For services requiring a premises visit, this information is used in conjunction with the installation calendar available through the inquiry mode of LENS to determine available installation dates that can be offered to customers.

In addition to providing the installation calendar, LENS provides an alternative due date function in the firm order mode. For some types of orders issued through LENS, BellSouth currently is re-evaluating that alternative due date function. CLECs issuing LENS orders for conversions "as specified" and new installations should be aware that the LENS firm order due date function may not always be calculating the correct due date for those order types for some locations. The installation calendar available through the LENS inquiry mode and the firm order due date function for conversion "as is" orders issued through LENS are not affected. Also, orders issued through the industry-recommended Electronic Data Interchange (EDI) ordering interface are not affected.

We will notify you promptly of the results of our evaluation. Meanwhile, if you are placing orders through LENS for conversions "as specified" or for new installations, and the LENS order disagrees with the due date table, please submit the LENS order with the calculated due date, then contact the Local Carrier Service Center (LCSC) for assistance. If you are placing orders through the industry-recommended Electronic Data Interchange (EDI) ordering interface, or are issuing orders for conversion "as is" through LENS, please continue to establish due dates as usual.

Please contact your account manager if you have any questions.

Sincerely,

J. M. Baker

J.M. Baker V.P. - Sales



BellSouth Telecommunications, Inc.

205 977-3189

W. Scott Schooler
Vice President - Marketing
Interconnection Services

Room 34T95 675 West Peachtree Street Atlanta, Georgia 30375

SN91081234

September 17, 1997

To:

All Interexchange Carriers, &

Competitive Local Exchange Carriers

Subject: BellSouth Internet Web Site For Notification Letters

Beginning September 17, 1997, BellSouth Carrier Notification Letters will be distributed by posting them on the BellSouth Interconnection Services web page. This will provide you faster access to carrier notices. This information may be accessed from the BellSouth Corporate Homepage (http://www.bellsouth.com) by selecting "Interconnection" from the index and then "Carrier Notices" from the next index, or the web site may be directly accessed by entering the following address at the Netsite prompt:

http://www.bellsouth.com/interconnection/notices/index_notices.html

In order to view the carrier notices, it is necessary to install the Adobe Acrobat software. This is free software and is available from the Adobe web site (http://www.adobe.com). A link to the Adobe site is provided on the BellSouth Notification page.

Carrier Notices are currently available on this web site. On September 17, 1997, BellSouth Interconnection Services will begin to use this web site as the primary means to communicate our carrier notices. New carrier notices will be posted whenever they are issued, so check the site daily for the latest information. You will no longer receive paper copies through U.S. mail or electronic mail. However, if you desire a paper copy it will be faxed to you upon your request. Please send a written request with your name, address, telephone number and fax number to:

BellSouth Ethylyn W. Pugh E4H1 South 3535 Colonnade Parkway Birmingham, Alabama 35243